

U.S. Department of Justice

Washington, DC 20530

Short Form Registration Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS. Each partner, officer, director, associate, employee, and agent of a registrant is required to file a short form registration statement unless he engages in no activities in furtherance of the interests of the registrant's foreign principal or unless the services he renders to the registrant are in a secretarial, clerical, or in a related or similar capacity. Compliance is accomplished by filing an electronic short form registration statement at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .23 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name Richard Upchurch	2. Registration Number 6887
3. Residence Address 1855 Calvert Street NW Washington, DC 20009	4. Primary Business Address 1730 Rhode Island Avenue, Suite 512, NW Washington, DC 20036
5. Year of Birth 1987 Nationality UNITED STATES Present Citizenship UNITED STATES	6. If present citizenship was not acquired by birth, indicate when, and how acquired.
7. Occupation Consultant (Policy Manager)	
8. What is the name and address of the primary registrant? Name Access Partnership Corp. Address 1730 Rhode Island Avenue, Suite 512, NW, Washington, DC 20036	
9. (a) Indicate your connection with the primary registrant: <input type="checkbox"/> partner <input type="checkbox"/> director <input checked="" type="checkbox"/> employee <input type="checkbox"/> consultant <input type="checkbox"/> officer <input type="checkbox"/> associate <input type="checkbox"/> agent <input type="checkbox"/> subcontractor <input type="checkbox"/> other (specify) _____	
(b) Specify your position/title: Consultant (Policy Manager)	
10. List the foreign principal to whom you will render services in support of the primary registrant. Government of Bermuda Ministry of Home Affairs	

11. Describe in detail all services which you will render to the foreign principal listed in Item 10 either directly, or through the primary registrant listed in Item 8.

See Appendix for Response

12. Do any of the above described services include political activity as defined in Section 1(o) of the Act¹

Yes ☒

No ☐

If yes, describe separately and in detail such political activity. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation or dissemination of informational materials.

See Appendix for Response

13. The services described in Items 11 and 12 are to be rendered on a

☐ full time basis

☒ part time basis

☐ special basis

14. What compensation or thing of value have you received to date or will you receive for the above services?

☐ Salary: Amount \$ _____ per _____

☐ Commission at _____ % of _____

☒ Salary: Not based solely on services rendered to the foreign principal(s).

☐ Fee: Amount \$ _____

☐ Other thing of value _____

15. During the period beginning 60 days prior to the date of your obligation to register under FARA, have you, from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to political office or in connection with any primary election, convention, or caucus held to select candidates for any political office?

Yes ☐

No ☒

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
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EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

11/09/2020

Richard Upchurch

/s/Richard Upchurch

Date

Printed Name

Signature

¹ "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

12. Do any of the above described services include political activity as defined in Section 1(o) of the Act and in the footnote below?

Yes ☒

No ☐

If yes, describe separately and in detail such political activity.

2016: As part of effort to gain regulatory support for BermudaSat-1's entry into and licensing in U.S. market, arranged meeting with Jose Albuquerque, Satellite Division Chief of FCC, and Mindel de la Torre, Chief of International Bureau of FCC, to discuss freeze on applications of Direct Broadcast Satellites for U.S. service. (continued on next page)

13. The services described in Items 11 and 12 are to be rendered on a

☐ full time basis

☒ part time basis

☐ special basis

14. What compensation or thing of value have you received to date or will you receive for the above services?

☐ Salary: Amount \$ _____ per _____

☐ Commission at _____ % of _____

☒ Salary: Not based solely on services rendered to the foreign principal(s).

☐ Fee: Amount \$ _____

☐ Other thing of value _____

15. During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you make any contributions of money or other things of value from your own funds or possessions and on your own behalf in connection with any election to political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

9/21/2020

(Date of signature)

Sign

Richard Upchurch

(Signature)

Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

Appendix

Response to Item 11

Item 11: Describe in detail all services which you will render to the foreign principal listed in Item 10 either directly, or through the primary registrant listed in Item 8.

The scope of Access Partnership's work with the Government of Bermuda is primarily centered around developing an internal domestic space economy. Access Partnership works with the Government of Bermuda and industry stake holders in formulating and drafting policies, legislation and regulations, for the purposes of developing space and satellite business in Bermuda. Additional services include telecommunications and regulatory policy advice, representation on the government's Space and Satellite Policy Advisory Panel, satellite filing, UK-facing representation and advocacy, and additional ad hoc support. In terms of U.S. outreach, Access Partnership plans to continue outreach to NASA and U.S. Department of State in regards to future space and satellite development. The broad purpose of these outreach activities is to develop a partnership on space and satellite issues. Furthermore, Access Partnership plans to conduct NASA-facing outreach for the purposes of organizing an educational space camp.

Appendix

Response to Item 12

Item 12: Do any of the above described services include political activity as defined in Section 1(o) of the Act? If yes, describe separately and in detail such political activity. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation or dissemination of informational materials.

2016: As part of effort to gain regulatory support for BermudaSat-1's entry into and licensing in U.S. market, arranged meeting with Jose Albuquerque, Satellite Division Chief of FCC, and Mindel de la Torre, Chief of International Bureau of FCC, to discuss freeze on applications of Direct Broadcast Satellites for U.S. service.

2017: Engaged National Institute of Standards and Technology (NIST) to organize workshop in Bermuda on NIST Cybersecurity Framework. Coordinated on development of workshop with Matt Barrett, NIST Cybersecurity Framework Program Manager, and Donna Dodson, Chief Cybersecurity Advisor. Supported workshop in September 2017.

2017: Engaged National Aeronautics and Space Administration (NASA) to explore opportunities for collaboration/partnership-building around space and satellite issues. In December 2017, Arranged meeting with Al Condes, Associate Administrator for International and Interagency Relations at NASA, and Carolyn Knowles, Director of NASA Internships, Fellowships, and Scholarships, for such purpose.

March 2020: Provided support during meeting with Alexander MacDonald, Chief Economist in the Office of the Administrator at NASA, to discuss ideas for developing Bermuda's local space economy.

September/October 2020: Arrange interview with online publication Via Satellite regarding Bermuda's support for manned and unmanned space flight, as well as Bermuda's broader space and satellite efforts.